

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-36-40)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS-36-40, filed on September 17, 1997. A partial objection to interrogatory UPS/USPS-38 was filed on September 29, 1997.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

  
Anne B. Reynolds

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October 1, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-36.** With reference to the Postal Service's response to Presiding Officer's Information Request No. 1.a.(1), please provide the following:

- (a) an explanation of how the average cost per cubic foot mile was calculated.
- (b) all supporting data, or reference in the record to supporting data sufficient to replicate those calculations.
- (c) confirmation that the average cost per cubic foot mile is the cost per cubic foot mile of capacity instead of the cost per cubic foot mile of actual volume transported. Please describe any non-confirmation.
- (d) confirmation that the Intra-Alaska linehaul Air Rates are costs per ton mile of actual mail volume transported instead of the cost per ton mile of capacity. Please explain any non-confirmation.

**UPS/USPS-36 Response:**

- (a) Cost per cubic foot mile estimates are obtained via field surveys. The average cost per cubic foot mile is a weighted average of these estimates by contract type.
- (b) See Library Reference H-82, pages 41, 85, 132 and 180.
- (c) Confirmed.
- (d) Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
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**UPS/USPS-37.** Please refer to the Revenue, Pieces, and Weight (RPW) Reporting System and other systems as appropriate. Provide the Government FY1996 mail volume drop shipped by mailers at postal facilities for:

- (a) each class of mail; and
- (b) subclass and rate category.
- (c) Identify the data subsystems used to identify the drop shipped volumes for each class and subclass in (a) and (b) above.

RESPONSE:

(a) - (b) The RPW system reports drop shipped mail only when the drop shipping is a dimension of the rate category. Therefore, data is available for Third-Class bulk mail drop shipped items and Fourth-Class DBMC. These results may be found in the FY 96 Billing Determinants filed as LR H-145.

(c) Third-Class activity is identified under the Bulk Mail RPW subsystem. Fourth-Class DBMC volumes are identified under the Domestic RPW subsystem.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
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**UPS/USPS-38.** Please refer to the Revenue, Pieces and Weight (RPW) Reporting System and other systems as appropriate. Provide the Third Class Government Fiscal Year 1996 volumes, dropshipped at each BMC and ASF and SCF.

RESPONSE:

Please refer to UPS/USPS-37.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
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**UPS/USPS-39.** Please identify and describe mail volume information available for each class and subclass of mail for Government FY1996.

- (a) mail destinating in an SCF service area; and
- (b) mail originating in SCF service area.

**RESPONSE:**

The Postal Service does not collect origin and destination information by GFY.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
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**UPS/USPS-40.** Please provide Government FY1996 mail volume by class for each SCF for each category below for:

- (a) mail destinating in each SCF service area; and
- (b) mail originating in each service area.

RESPONSE:

Please see response to UPS/USPS-39.

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Anne B. Reynolds

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October 1, 1997